# LOCAL BANKRUPTCY FORM 5071-1 THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)

IN RE:

DANIEL J. CHATTERTON : BK. No. 1:16-bk-01511-RNO

A/K/A DAN J. CHATTERTON : Chapter No. 13

Debtor

11 U.S.C. §362

DITECH FINANCIAL LLC

Movant

: Name of Proceeding: MOTION FOR RELIEF FROM THE AUTOMATIC

: STAY

DANIEL J. CHATTERTON :

A/K/A DAN J. CHATTERTON Document # 62

Respondent

### REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance:

### Parties are trying to resolve the matter and request to continue to November 16, 2017

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated:

**September 18, 2017** 

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No. 89834 Phelan Hallinan Diamond & Jones, LLP 1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31387

Fax Number: 215-568-7616

Email: Thomas.song@phelanhallinan.com

# THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)

IN RE:

DANIEL J. CHATTERTON : BK. No. 1:16-bk-01511-RNO

A/K/A DAN J. CHATTERTON : Chapter No. 13

Debtor

: 11 U.S.C. §362

DITECH FINANCIAL LLC

Movant : Name of Proceeding: MOTION FOR

. RELIEF FROM THE AUTOMATIC

:

DANIEL J. CHATTERTON : STAY

A/K/A DAN J. CHATTERTON :

Respondent Document # 62

## **CERTIFICATION OF SERVICE**

#### TO THE BANKRUPTCY COURT CLERK:

Service upon the following persons was made by sending a true and correct copy of the Request to

Continue Hearing/Trial with Concurrence by first class mail or electronic means on the date listed below.

CHARLES J DEHART, III, ESQUIRE (TRUSTEE)

8125 ADAMS DRIVE, SUITE A

HUMMELSTOWN, PA 17036

DANIEL J. CHATTERTON

763 SOUTH RAILROAD STREET

PALMYRA, PA 17078

TRACY LYNN UPDIKE, ESQUIRE 2080 LINGLESTOWN ROAD STE 201 HARRISBURG, PA 17110

UNITED STATES TRUSTEE 228 WALNUT STREET, SUITE 1190 HARRISBURG, PA 17101

DATE: September 18, 2017

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No. 89834 Phelan Hallinan Diamond & Jones, LLP 1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31387

Fax Number: 215-568-7616

Email: Thomas.song@phelanhallinan.com